

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

KARLA K. ALLSBERRY and LORI RUSSELL,)
)
Plaintiffs,)
)
v.) Case No. 4:19-cv-02366
)
JUDGE PATRICK S. FLYNN, et al.,)
)
Defendants.)

**PLAINTIFF KARLA ALLSBERRY'S SUPPLEMENT TO HER SUPPLEMENTAL
MOTION FOR A TEMPORARY RESTRAINING ORDER**

COMES NOW Plaintiff, Karla K. Allsberry ("Karla"), for her supplement to her Supplemental Motion for a Temporary Restraining Order (Doc. #66), and respectfully submits the following:

1. Attached hereto as Exhibits A, B and C are the February 9, 2021 and February 12, 2021 letter from Karla's attorney to Judge Flynn's attorney (Exhibits A and B) and the responsive letter from Judge Flynn's attorney dated February 15, 2021 to Karla's attorney (Exhibit C).
2. In Exhibit C, Judge Flynn takes the position that his letter of May 28, 2019 is actually an "Order" and that it remains in full force and effect, notwithstanding Judge Callahan's Final Judgment declaring that Judge Flynn lacked authority to place Karla on indefinite administrative leave and to bar her from the Clerk's office.
3. Judge Flynn also refuses to post a *supersedeas* bond to stay enforcement of Judge Callahan's Final Judgment while Judge Flynn's state court appeal is pending.

4. Unless injunctive relief is provided to Karla by the Court *sub judice*, Karla will have no alternative but to appear in the Clerk's office and attempt to perform her duties as elected Clerk of the Circuit Court, risking a confrontation with Judge Flynn.

WHEREFORE, Plaintiff, Karla K. Allsberry, moves the Court to lift the stay under the *Pullman* abstention doctrine and to grant her Motion for a Temporary Restraining Order permitting her to resume her duties as elected Clerk of the Circuit Court.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies a true copy of the foregoing was filed electronically with the Clerk of the Court, the Clerk will electronically serve counsel of record, and a copy was sent via email this 18th day of February, 2021, to the parties listed below:

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